

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

DRUMMOND COMPANY INC,

Plaintiff,

v.

UNITED STATES  
ENVIRONMENTAL  
PROTECTION AGENCY,

Defendant.

CIVIL ACTION NO.

2:15-cv-01491-KOB

**JOINT STATUS REPORT AND  
JOINT MOTION**

**JOINT STATUS REPORT AND JOINT MOTION TO CONTINUE STAY  
OF ALL PROCEEDINGS PENDING  
SETTLEMENT NEGOTIATIONS**

Pursuant to the Court Order entered on November 8, 2016 (docket entry 57), Plaintiff Drummond Company Inc. (“Drummond”) and Defendant United States Environmental Protection Agency (“EPA”), by their respective counsel, hereby jointly submit this status report detailing the status of the case. Defendant’s Motion for Partial Summary Judgment and Plaintiff’s Opposition thereto have been submitted and are pending before the Court. The Parties have been discussing settlement. The Parties agree that they need additional time to pursue a potential settlement resolving Plaintiff’s claims.

Based on the foregoing, the Parties jointly seek a continuance of the stay of all proceedings in this action for an additional 60 days, until March 24, 2017, while the Parties continue to pursue settlement of Plaintiff's claims in this litigation.

Submitted this 23<sup>rd</sup> day of January, 2017.

*For the Plaintiff:*

/s/ Richard E. Glaze

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